

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GABRIEL CHALEPLIS and ONE WORLD,
LLC,

Plaintiffs,

-against-

MICHAEL KARLOUTSOS, JAMES M.
RODGERS ESQ., MAK CONSULTING LLC,
RODGERS INVESTMENTS LLC, and
JAMES M. RODGERS P.C.,

Defendants.

21-cv-01492-MSG

ORAL ARGUMENT REQUESTED

**DEFENDANT MICHAEL KARLOUTSOS AND
HIS COUNSEL'S CROSS-MOTION TO SANCTION
PLAINTIFFS' COUNSEL HARALAMPO (BOB) KASOLAS, ESQ.**

Defendant MICHAEL KARLOUTSOS ("Karloutsos") and his undersigned counsel, upon the accompanying Declaration of Randall L. Rasey and the exhibits thereto, and the accompanying Memorandum of Law, and upon all of the papers and proceedings heretofore had herein, hereby cross-moves this Court, pursuant to 28 U.S.C. § 1927 and the Court's inherent authority, to sanction Haralampo (Bob) Kasolas, Esq., of Brach Eichler LLC, admitted *pro hac vice* by this Court as counsel for plaintiffs GABRIEL CHALEPLIS and ONE WORLD, INC., for his engaging in harassing, abusive, and frivolous litigation conduct, and unreasonably and vexatiously multiplying the proceedings in this case, by means of filing a frivolous motion for sanctions and disqualification of said defendant's undersigned counsel Randall L. Rasey (ECF Doc. No. 178, *et seq.*).

WHEREFORE, defendant MICHAEL KARLOUTSOS and his undersigned counsel Randall L. Rasey ask this Honorable Court to sanction attorney Haralampo (Bob) Kasolas, including by requiring him to pay the attorneys' fees and expenses incurred as result of his motion

and the instant cross-motion, and grant such other and further relief as this Honorable Court may deem just and proper.

Dated February 27, 2024

Respectfully submitted,

BARTON LLP

By: 
Randall L. Rasey (*admitted pro hac vice*)

711 Third Avenue, 14th Floor
New York, NY 10017
(212) 687-6262
rrasey@bartonesq.com
jcabanas@bartonesq.com

-and-

Douglas F. Johnson (ID No. 40036)
Carol S. Harding (ID No. 67142)
EARP COHN P.C.
123 Broad Street, Suite 100
Philadelphia, PA 19109
(215) 963-9520
dfjohnson@earpcohn.com
csharding@earpcohn.com

*Attorneys for Defendant Michael Karloutsos and
MAK Consulting LLC*